

# Department of the Army United States Army Garrison Baumholder Unit 23746 APO AE 09034-0003

IMEU-BMH-ZA March 2012

**Environmental Management System** 

**Summary:** This work instruction provides procedures to carry out the Garrison Environmental Management System.

**Applicability:** To all civilian and military personnel working for or on behalf of the USAG Baumholder, to include host and tenant organizations, residents, and contractors.

**Records Management:** Records created as a result of processes prescribed by this instruction must be identified, maintained, and disposed of according to AR 25-400-2. Record titles and descriptions are available on the Army Records Information Management System website at https://www.arims.army.mil

**Suggested Improvements:** The proponent of this instruction is the Directorate of Public Works, Environmental Division (IMBM-PWE), UNIT # 23746, Box #16, APO AE 09034, DSN 485-6858. Users may suggest improvements to this procedure by contacting the proponent or submitting DA Form 2028.

FOR THE COMMANDER:

SAM R. McADOO LTC, SC Commanding

**Distribution:** USAG-BMH-A

# **Summary of change:**

This new instruction, dated March 2012

- o Creates a new single instruction incorporating multiple procedures previously issued separately.
- o It summarizes information in the form of a manual, henceforth referred to as manual, versus procedure or publication.
- o It constitutes an overview of the Environmental Management System and provides direction to related documentation by providing links better suitable to be publicized and utilized electronically in support of the Army's less paper policy and improved customer accessibility.
- o Format and structure have been revised to meet administrative publication requirements IAW DA Pam 25-40.

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## 1. Purpose

- 1.1. This Environmental Management System Manual is a repository for documentation related to the USAG Baumholder Environmental Management System (EMS).
- 1.2. It shows the interaction of its various elements meeting the International Organization for Standardization (ISO) 14001-2004 requirements including, but not limited to:
  - 1. Environmental Policy
  - 2. Planning and Preparations
  - 3. Implementation and Operation
  - 4. Checking and Corrective Actions
  - 5. Management Review with the goal of continual improvement and sustainment

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# 2. Background

- 2.1. Executive Order (EO) 13148 "Greening the Government through Leadership in Environmental Management" requires all DoD Garrisons worldwide to implement an environmental management system (EMS) to improve the environmental performance of their activities, products and services.
- 2.2. The Deputy Assistant Secretary of the Army (Environment, Safety, and Occupational Health) signed an action memorandum on EMS, dated 6 Aug 01, which directs installations to initiate EMS implementation no later than (NLT) fiscal year 2004 (FY04) with an EMS in place NLT 31 December 2005. The memorandum also states that ISO 14001 is the EMS model the installations must adopt, and full conformance with ISO 14001 should be completed NLT FY09. It is also indicated that third-party registration to the standard is not required; however installation commanders may pursue registration when it provides clear and documented mission benefits.
- 2.3. In October 2002 a "Gap Analysis" was conducted in the Garrison. The purpose of the analysis was to determine current environmental management practices and compare them to ISO 14001 standards. This analysis evaluated present environmental activities and identified both strengths of the current system and missing elements.
- 2.4. In November 2004 an Implementation Plan was developed based on the results of the Gap Analysis. The plan was designed to describe the Commander's strategy for meeting the following requirements:
- 2.4.1. To comply with Department of Defense's (DoD) EMS implementation policy that requires all installations to "complete a written EMS implementation plan".
- 2.4.2. To establish and maintain a plan that details the key actions required for the USAG to satisfy the implementation requirements of Executive Order (EO) 13148, Army/DoD policy and ISO 14001.
  - 2.5. EMS Implementation Start Date: 2004
  - 2.6. EMS Implementation Completion Date: Ongoing

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#### 3. Scope

The scope of the EMS of the USAG Baumholder includes all activities, processes, services, and products within Garrison, applicable to all tenants, DoD dependants and contractors. The surrounding communities, regulators and other interested parties shall be notified of the installation's EMS efforts and encouraged to become participants in and / or contributors to the process.

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#### 4. Maintenance of EMS

- 4.1. The Environmental Division (ED) in coordination with the USAG Baumholder EMS Management Representative (EMSMR) are overseeing the EMS and administration of this manual. The manual is managed and maintained by the ED.
  - 4.2. This manual will be posted on the USAG web site.
  - 4.3. The manual shall be reviewed on an annual base and updated if required.

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# 5. USAG policy

- 5.1. The revised Garrison EMS Policy was signed by the Garrison Commander.
- 5.2. The environmental policy is a self-commitment of the USAG Baumholder concerning pollution prevention, compliance with legal and other environmental requirements and continual improvement of the Garrison's environmental performance.
- 5.3. The environmental policy is published on the Garrison website and shall be communicated during all training sessions on environmental issues.

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#### 6. Planning requirements

#### **6.1.** Environmental Aspects

- 6.1.1. Environmental aspects are interactions with the environment.
- 6.1.2. Interactions are identified by reviewing all the activities, products and services of the Garrison and assessing the possibility each of them have for an environmental risk or impact.
- 6.1.3. The EMS is designed to control and reduce, where possible, the impacts associated with aspects that have been determined to be significant, based on several criteria, which include, but are not limited to:
  - 1. Frequency or likelihood
  - 2. Mission impact
  - 3. Community concerns
  - 4. Severity of the impact on the environment
  - 5. Legal and other requirements

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# **6.2.** Legal and Other Requirements

- 6.2.1. Certain environmental aspects are significant for an organization because they are regulated or the subject of certain legal or other requirements, which can affect the Garrison's ability to carry out its mission.
- 6.2.2. These include U.S. or Host Nation's federal, state and city laws, regulations, executive orders, as well as, industry standards, and Garrison policies, guidance and memoranda.
- 6.2.3. The ED has a procedure to identify these requirements for its environmental significant aspects.

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# **6.3.** Objectives, Targets, and Programs

- 6.3.1. Objectives and Targets for significant aspects are listed in the Environmental Management Programs (EMPs).
- 6.3.2. Objectives and targets are established to address significant environmental aspects.
- 6.3.3. Objectives and targets are set by considering, in part, the legal and other requirements, the views of interested parties, as well as, technological, financial and other operational considerations.
- 6.3.4. EMPs serve to achieve the organization's objectives and targets, and are therefore linked directly to them.
- 6.3.5. EMPs contain information describing the approaches and strategies for achieving objectives and targets, as well as the performance indicators, the operational controls, and the actions and timeframes to accomplish the objectives and targets.
- 6.3.6. The EMP ties many elements of the EMS together (e.g., significant aspects, objectives and targets, responsibilities, and operational controls) and provides an integrated view of the disparate requirements in the EMS.

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# 7. Implementation and operation

# 7.1. Roles, Authorities and Responsibilities

- 7.1.1. The roles and responsibilities for activities under the EMS are defined in the EMPs.
- 7.1.2. While the EMS at USAG Baumholder is largely sustained by the ED it still contains a commitment of soldiers, civilian work force (including contractors), and family members.
- 7.1.3. The EMS Management Representative (EMSMR) is responsible for leading the creation, implementation, and maintenance of the EMS in coordination with the EMS Coordinator.

7.1.4. An EMS Cross Function Team (CFT), composed of representatives from each unit/activity and several members of the ED, plays an advisory role and provides on-going support.

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# 7.2. Training, Awareness, and Competence

- 7.2.1. EMS requires two types of training:
  - 1. general awareness
  - 2. competence training
- 7.2.2. General awareness training for all employees focuses on the importance of the environmental policy, the role of employees, and the potential consequences of failing to provide environmental care.
- 7.2.3. Competence training is prescribed for personnel working in proximity to significant environmental aspects and focuses on the possible significant impacts of those aspects, their specific roles and responsibilities, the objectives and targets for those aspects, and the operational controls in place to avert the actualization of the potential impacts.
- 7.2.4. The ED together with EMSMR, Garrison Safety Officer, Fire Department Chief ensures that both types of training are conducted as appropriate to satisfy these requirements.

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# 7.3. Communication

- 7.3.1. The EMS manual is posted on the internet to make it readily accessible in a convenient format for Garrison members and external interested parties.
- 7.3.2. Clearly, effective integrated environmental management demands effective communications to coordinate staff internally and to liaise with external interested parties.
- 7.3.3. Communication is a two-way process; that employees can make recommendations to management and give their views when necessary.

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#### **7.4.** Document Control

- 7.4.1. Due to the wide variety of documents used in the EMS it is essential that a formal approach be developed to control and organize them.
- 7.4.2. The procedure for document control is based on the Army system for document control.

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# 7.5. Operational Control

7.5.1. It is important to control those activities, products or services that might cause a deviation from the organization's environmental policy or result in significant impacts.

7.5.2. Operational controls specify engineering or administrative measures implemented to reduce the risk that an impact will occur. They are designed to support the achievement of EMS objectives and targets and are included as an integral component of the Environmental Management Programs.

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# 7.6. Emergency Preparedness and Response

- 7.6.1. The EMS provides a systematic method to manage known and expected elements of the organization's operations. However, despite best efforts there is the possibility of unpredictable accidents and emergencies.
- 7.6.2. Emergency Procedures for the Garrison provide for the unexpected. From the perspective of the EMS, it is necessary that measures be included in this plan to address the environmental consequences of such occurrences.

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# 8. Checking and corrective action

# 8.1. Monitoring and Measurement

- 8.1.1. Monitoring and measurement is fundamental to the EMS. It ensures for management plans, controls, and training being effective.
- 8.1.2. It enables the Garrison to identify its progress toward achieving objectives and targets, and the reasons for our level of achievement.
- 8.1.3. Without effective monitoring and measurement it would be impossible to continually improve which is the basis of the EMS.
- 8.1.4. Periodically monitoring for performance, operational controls, and general conformance with EMS objectives and targets will be performed at the Garrison.

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#### **8.2.** Evaluation of compliance

The EPAS program will provide the Army's external and internal auditing and can be used to help an installation objectively determine conformance to the ISO 14001 standard.

#### **8.3.** Nonconformance and Corrective and Preventive Action

With identification of a weakness in the EMS or an ineffective part, a correction will be initiated. The EMS has a procedure to receive, document and investigate problems, understand their root causes, and then implement corrective actions that prevent recurrence.

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#### 8.4. Records

- 8.4.1. EMS records include, but are not limited to records of various implementation activities and other EMS results from training, audits and management reviews.
- 8.4.2. Records must be created and managed in way they can be easily accessed and retrieved.

8.4.3. Records are supposed to be maintained in accordance with the Army Records Management System (ARIMS), Guide to Recordkeeping in the Army, Preparing and Managing Correspondence, the Army and Army in Europe Publishing Program, Forms Management Analysis, and Design, and Website Administration.

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# 8.5. Internal EMS Audits

- 8.5.1. The Environmental Division conducts internal EMS audits to test whether the system as it has been established, is being implemented and maintained as designed.
- 8.5.2. The reason to look at compliance data during an EMS audit, for example, is not to test the organization's regulatory posture, but rather to test whether the implemented programs are actually working as they were intended to work to achieve and maintain compliance, respectively provide for continued improvement, and ultimately sustain environmental performance.

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# 9. Management review

- 9.1. The ED must not only formulate and articulate the environmental commitments of the organization in the environmental policy, but must also render judgment on whether the EMS continues to be suitable, adequate and effective.
- 9.2. Evaluating factors can be development in legal and other requirements, changes in organizational infrastructure, or other impacting occurrences.
- 9.3. This is accomplished through the periodic management review that affords management the opportunity to judge the EMS and its results. On that basis, management is expected to make decisions relative to the EMS so that it continues to perform and deliver as expected.

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#### 10. Definitions

#### 10.1. Continual Improvement

An ongoing process of performance enhancement. In the context of this environmental standard, it means the enhancement of the organization's overall environmental performance by implementation and maintenance of an environmental management system and by improving its ability to manage the environmental aspects of its activities, processes, services, and products.

#### 10.2. Corrective actions

Steps taken to remove the causes of an existing nonconformity. Corrective actions address actual problems. In general, the corrective action process can be thought of as a problem solving process.

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# 10.3. **Detailed documented procedure**

Defines and controls the work that should be done, and explains how it should be done, who should do it, and under what circumstances. In addition, it explains what authority and what responsibility has been allocated, which supplies and materials should be used, and which documents and records must be used to carry out the work.

# 10.4. **Document(s)**

Provide information, such as specifications, quality manuals, quality plans, records, and procedures, is information is placed on a medium. In this context, the term medium usually refers to paper. But it can also refer to electronic, magnetic, or optical disks. A set of documents is often referred to as documentation.

#### 10.5. Environment

Refers to an organization's natural and human surroundings. An organization's environment extends from within the organization itself to the global system, and includes air, water, land, flora, fauna, as well as human beings.

## 10.6. Environmental Aspect

An environmental aspect is a feature or characteristic of an activity, product, or service which affects or can affect the environment. In order to identify environmental aspects an assessment must be performed how activities, products, and services of an organization affect the environment. For each type of activity, product, or service environmental aspects arise. Not every aspect has to be taken into consideration. Only the most significant environmental aspects - those that have or could have a significant environmental impact - have to be improved.

#### 10.7. Environmental Impact

Change to the environment. Such change can be positive or negative. Environmental impacts are caused by environmental aspects. Environmental aspects can have a direct and decisive impact on the environment or contribute only partially or indirectly to a larger environmental change.

# 10.8. Environmental Management System

The EMS part of this larger management system is used to establish an environmental policy and to manage the environmental aspects of an organization's activities, products, and services.

#### 10.9. Environmental objective

A specific environmental goal. The organization's environmental objectives must be consistent with its environmental policy.

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#### 10.10. Environmental performance

Provides information how well an organization manages the environmental aspects of its activities, products, and services and the impact they have on the environment. The organization's environmental performance can be improved by reducing its negative environmental impact or increasing its positive environmental impact. In order to be able to determine how well environmental aspects are being managed, environmental performance must be measurable. By comparing environmental management achievements against environmental policy, objectives, targets, or any other suitable environmental performance requirements overall environmental performance can be measured.

## 10.11. Environmental policy

Emphasizes the need to prevent pollution and to comply with all relevant legal and other requirements. In general, an environmental policy must be used to generate environmental objectives and targets, and should act as a general framework for action.

# 10.12. Environmental target

Environmental targets are derived from environmental objectives and are used to achieve these objectives. Targets can apply to specific areas or to the organization as a whole.

# 10.13. Interested party

Is a person or group that has a stake in the environmental performance of an organization. Interested parties may be directly affected by the organization or actively concerned with its environmental performance.

#### 10.14. Internal audit

Systematic evidence gathering process which is carried out in order to evaluate how well an environmental management system meets a set of audit criteria established by your organization. Internal audits must be independent, objective, and impartial. Internal audits must determine whether an environmental management system complies with the ISO 14001 standard and other planned arrangements.

# 10.15. Management System

Network of interrelated elements. Elements include responsibilities, authorities, relationships, functions, processes, procedures, practices, and resources. A management system uses these elements to establish policies and objectives and to develop ways of applying these policies and achieving these objectives.

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#### 10.16. **Nonconformity**

The result of an organization which deviates from the requirements of the ISO 14001. When a product, process, procedure, system, or structure deviates from the standard, a formal nonconformity exists.

# 10.17. Organization

Company, corporation, firm, or institution which has its own functions and administration. It can be either incorporated or unincorporated, privately or publicly owned.

#### 10.18. Publications

Items of information printed or reproduced, whether mechanically or electronically, for distribution or dissemination, usually to a predetermined audience; include directives, books, pamphlets, posters, manuals, brochures, magazines, and newspapers produced in any media by or for the Army.

#### 10.19. Preventive actions

Steps taken to remove the causes of potential nonconformities which have not yet occurred. In general, the preventive action process can be thought of as a risk analysis process.

# 10.20. Prevent pollution

Actions to avoid, reduce, or control the creation, emission, or discharge of contaminants or waste materials. Pollution must be prevented in order to reduce adverse environmental impacts. Organizations use a wide variety of methods, techniques, practices, processes, products, and services to prevent pollution. These include the reduction or elimination of pollution at the source; the efficient use of resources, materials, and energy; the reuse, recovery, reclamation, and recycling of resources; the redesign of processes, products, and services; and the substitution of one type of energy source or substance for another cleaner energy source or substance.

#### 10.21. **Product**

An output as a result of a process, which can be tangible or intangible, a thing or an idea, hardware or software, information or knowledge, a process or procedure, a service or functions, or a concept or creation.

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#### **10.22. Records**

All books, papers, maps, photographs, machine—readable materials, or other documentary materials regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of the data in them.

Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference and stocks of publications and of processed documents are not included.

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# Appendix 1

**Environmental Management System (ISO 14001:2004 chapter 4.3.1)** 

BMH EP 4.3.1 Procedure to determine, track and score environmental aspects

**Summary:** This procedure provides guidance how to identify, track and rank environmental aspects at USAG Baumholder

**Applicability:** To all personnel working on behalf of the USAG Baumholder Environmental division

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

Forms: Aspect evaluation sheet

**Suggested improvements:** Send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the proponents listed above

**Summary of Change:** The revision dated February 2012:

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o adds a summary of change
- o adds new roles and responsibilities
- o provides a new standard for scoring of aspects

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## 1. Purpose

This procedure sets rules to identify new activities, products, and services introduced at USAG Baumholder. It also describes methods and procedures to perform aspect / impact assessment.

#### 2. Definitions

- **2.1. Aspect:** An element of an activity, product, or service that interacts with the environment.
- **2.2.** Activities, Products and Services: Term used to encompass the everyday activities of the USAG Baumholder. Includes, but is not limited to: training, munitions testing, construction and renovation of real property, manufacturing activities, dry cleaning, refueling stations, wash rack operations, grounds maintenance, vehicle maintenance, etc.
- **2.3. Environmental Impact:** Any change to the environment, whether adverse or beneficial, wholly or partially resulting from the facility's activities, processes, or services.
- **2.4. Significant Aspect:** An environmental aspect that potentially has a significant environmental or mission impact.
- **2.5. SME**: Subject Matter Expert. This is an individual working direct at or with the service which is identified to have an environmental impact. This person knows the service best and can provide knowledge to rank the aspect.
- **2.6. Scope of the EMS:** The scope of the EMS of the USAG Baumholder includes all activities, processes, services, and products within Garrison, applicable to all tenants, DoD dependants and contractors.

# 3. Responsibilities

### 3.1. CFT

- 3.1.1. Supports the ED with identification and scoring of new aspects
- 3.1.2. Provides SMEs
- 3.1.3. Supports the aspect / impact review

#### 3.2. Environmental Division

- 3.2.1. Performs aspect / impact reviews when applicable
- 3.2.2. Updates the aspect / impact assessment table
- 3.2.3. Ranks newly identified aspects
- 3.2.4. Communicates significant aspects to the CFT

#### **3.3. SMEs**

- 3.3.1. Support the ED with identification and scoring of new aspects
- 3.3.2. Support the aspect / impact review

# 4. Procedure

#### 4.1. Identification of new activities, products, and services

- 4.1.1. Inspections: During environmental inspections performed by the ED new activities, products, and services can be discovered. New aspects have to be tracked in the aspect / impact spreadsheet and ranked as described in chapter 5 of this procedure.
- 4.1.2. Meetings: During meetings (CFT, EQCC...) tasks newly assigned to the Garrison may be identified. The ED has to check these tasks for environmental impacts.
- 4.1.3. Change in mission: A change in mission often results in new activities, products, and services. The ED will identify changes to the mission during meetings, inspections, walk-through, or interviews.

# 4.2. Aspect / impact assessment

When the EMS was introduced at USAG Baumholder an initial aspect / impact assessment was performed. This assessment is reviewed when it seems appropriate by the ED. The CFT and SMEs serve as support for the review.

## 4.3. Significant aspects

- 4.3.1. Aspects are ranked according to chapter 6 of this procedure. The aspect with the highest score will become significant.
- 4.3.2. The Garrison Commander may also suggest a significant aspect based on Command interest.
- 4.3.3. Once an aspect has been determined significant it will be dealt with as described in EMS procedure 433 for objectives and targets.

# 5. Scoring of aspects

Once all aspects are entered into the spreadsheet they shall be scored for their significance. The scoring itself is done by the ED with support of the SMEs. For scoring aspects, the following considerations need to be made and documented.

# 5.1. Frequency or likelihood

The probability that an impact might occur, or how often it actually occurs, affects the significance of the impact. The frequency or likelihood of the impact occurring is evaluated, not the frequency of the activity that is causing the impact.

- 5= Continuous ongoing or daily
- 4= Frequent more than once per month
- 3= Infrequent more than once per year, less than once per month
- 2= Rare once every year or two
- 1= Never never or highly unlikely

# 5.2. Environmental Impact Severity

The following shall be considered when considering severity:

- 1. Proximity of the impact to people or environmentally sensitive areas
- 2. Toxicity of substances involved
- 3. Quantities of substances involved

- 4. Effects from startup and shutdown conditions
- 5. Duration of exposure or effects
- 6. Size of area affected
- 7. Potential for migration of the hazard
- 5= Severe immediate threat likely to result in widespread damage to human health or the environment and the requiring great effort to remediate or correct
- 4= Serious no immediate health threat, but likely to significant damage the environment and difficult but possible to remediate
- 3= Moderate somewhat harmful, but correctable
- 2= Mild small potential for harm to environment, correctable
- 1= Insignificant trivial consequences, easily correctable or not impact

# 5.3. Mission Impact Severity

The following rating factors describe how the mission would be affected if an environmental impact actually occurs. The severity of the impact on mission accomplishment can be influenced by the following:

- 1. Priority or importance of the impacted missions
- 2. Restrictions of specific activities (digging, using smoke, etc.)
- 3. Duration restrictions (such as limiting boiler operations to 12 hours a day)
- 4. Permanent versus temporary closure or restrictions of training areas or industrial processes
- 5. Availability of alternative training sites or training techniques
- 5= Loss of ability to accomplish critical mission or near mission failure
- 4= Severely degraded mission capability or serious mission restrictions
- 3= Moderate mission restrictions
- 2= Minor mission impacts or restrictions
- 1= Insignificant mission impacts or restrictions and alternative courses of action available
- 0= No mission impacts or restrictions

# **5.4.** Regulatory Impact

The following shall be considered when evaluating regulatory impact:

- 1. Federal, state, and local statutes and regulations
- 2. Federal, state, and local permit requirements or compliance agreement provisions
- 3. Host nation statutory requirements and agreements
- 4. Executive orders
- 5. Army and DoD regulations, policies, and directives

- 4= Federal, state, or host nation statutory requirements or regulations apply
- 3= Likely to be regulated in future by federal, state, or host nation agency
- 2= Army or DoD requirements apply
- 1= Best management practice applies
- 0= No requirements apply

# **5.5.** Community Concerns

The following actions or situations shall be considered when determining community concerns:

- 1. Lawsuits
- 2. Obstruction efforts
- 3. Negative or positive press coverage
- 4. Number and scope of citizen complaints
- 5. Community-generated political or regulator interest
- 6. Level of positive interaction with the local community
- 4= Public outcry or lawsuits
- 3= Serious community concern, political or activist inquiries, intense negative media
- 2= Moderate community concern, some media coverage
- 1= Community not currently concerned, but could become so
- 0= Community not concerned

# **6.** Determining Significant Aspects

The formula for calculating the significance score is:

Significance score = frequency x (environmental impact severity + mission impact severity) + regulatory impact + community concern

The aspect with the highest score will become significant and worked on as described in BMH procedure 433 objectives and targets. The ED, in coordination with the EMSMR and CFT will decide how many aspects will be considered significant at any one time. There will be at a minimum 1 significant aspect with a maximum of 3.

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# Appendix 2

Environmental Management System (ISO 14001:2004 chapter 4.3.2)

# BMH EP 4.3.2 Procedure for Legal and other Requirements

**Summary:** This publication provides a summary how to identify legal and other requirements for USAG Baumholder's significant aspects

**Applicability:** This procedure applies for legal and other requirements for managing significant aspects

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes or revisions shall comply with this procedure

Form(s): No forms are required by this procedure

**Suggested improvements:** Send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the proponents listed above

# **Summary of Change:**

The revision dated February 2012:

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o provides a table of legal and other requirements sources
- o adds new roles and responsibilities

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## 1. Purpose

The environmental division (ED) is required to identify legal and other requirements for significant aspects. Legal and other requirements are summarized in aspect specific Environmental Management Programs (EMPs) as described in BMH EP 443.

#### 2. Definitions

**EMS legal and other requirements** encompass all the constraints imposed on USAG Baumholder to control its significant aspects. Included are:

- 2.1. Federal
- 2.2. State
- 2.3. Local laws and regulations
- 2.4. Military (DoD and DA) instructions, directives, manuals and policy decisions

## 3. Responsibilities

#### 3.1. CFT

- 3.1.1. Serves as the first source for legal and other requirements
- 3.1.2. Supports the preparation of EMPs

# 3.2. Commanders / directors / organization chiefs

- 3.2.1. Have knowledge of legal and other requirements
- 3.2.2. Follow legal and other requirements
- 3.2.3. Ensure communication of legal and other requirements
- 3.2.4. Ensure access to legal and other requirements for all personnel under their jurisdiction

# 3.3. Soldiers / employees

- 3.3.1. Know about legal and other requirements of the organization or know to contact their chain of command to get information
  - 3.3.2. Follow legal and other requirements

#### 4. Procedure

# 4.1. Identification of legal and other requirements

Methods to stay up to date with requirements include Federal and State agency websites, official online services, professional workshops and conferences, state and federal permits, newsletters, training classes, online groups, and others. Information sources include:

- 4.1.1. Regulatory Agency WebPages
- 4.1.2. DoD and Army WebPages
- 4.1.3. Written notices from regulatory agencies
- 4.1.4. Communication with regulatory agencies
- 4.1.5. Communication with local counties

Table 1 provides useful links to obtain legal and other requirements. These links are provided to help in the search for the most current legal and other requirements, but should not be the sole source of information.

According to the ISO standard there is no need to maintain a list or database of legal and other requirements. Therefore no centralized list or database will be maintained at USAG Baumholder. Online databases like Umwelt-online are kept up to date automatically by the provider.

# 4.2. Identification of new legal and other requirements and changes

Supervisors review legal and other requirements on a regular basis. When requirements change supervisors have to inform the CFT and the ED of the changes. Affected EMPs shall be changed accordingly. Sources for new legal and other requirements or changes include:

- 4.2.1. Periodic contact with state and local regulatory officials
- 4.2.2. Periodic attendance at environmental training courses which include regulatory updates and compliance issues
  - 4.2.3. Newsletters in online forums
  - 4.2.4. Technical newspapers

# 5. Records management

Supervisors will maintain records of their legal and other requirements. Hard or electronic versions of these records will be maintained central and accessible.

Table 1 Useful links

	Sciul IIIIKS		
Name of Site / Host	Site description	Internet address	Origin
Army Publishing Directorate	Collections about different documents concerning the Army (Handbooks, Pamphlets, Forms)	http://www.apd.army.mil/	US
Army in Europe library & publishing system	Collections about different documents concerning the Army in Europe (Handbooks, Pamphlets, Forms)	https://aepubs.army.mil/ae/public/index.aspx	Europe
United States Environmental Protection Agency	Overview about the environmental system in the US	http://www.epa.gov/	US
German Environmental Protection Agency	Overview about the federal environmental system in Germany	http://www.umweltbundesamt.de/index-e.htm	German
Umwelt-online	Search engine for environmental laws	http://umwelt-online.de Login required. The login can be obtained from the Environmental Division	German
State Rheinland- Pfalz	Overview about the state environmental system in Rheinland-Pfalz	http://www.rlp.de/	German
City of Baumholder	Updates about the Baumholder German community	http://www.baumholder.de/	German

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# Appendix 3

**Environmental Management Systems (ISO 14001:2004 chapter 4.3.3)** 

BMH EP 4.3.3 Objectives, Targets and Environmental Management Programs

**Summary:** This procedure provides guidance how to determine and document environmental objectives and targets

**Applicability:** To all units, organizations and directorates working on and on behalf of the USAG Baumholder

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** Environmental Management Programs

**Suggested improvements:** Send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the proponents listed above

# **Summary of Change:**

The revision dated February 2012:

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o adds a summary of change
- o introduces environmental management programs

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## 1. Purpose

USAG Baumholder policy requires maintenance and improvement of significant aspects. Objectives and targets are assigned to significant aspects to define the desired final outcome for the associated environmental impact.

#### 2. Definitions

- **2.1. Objectives:** Specific issues where the installation will focus its efforts based on the results of the environmental significance ranking.
- **2.2. Targets:** Are established to support objectives. An objective may have many targets associated with it. Targets are more specific than objectives and typically force some specific action. Targets are measurable and have a completion date.
- **2.3.** Environmental management program (EMP): Program for addressing and managing the objectives and targets associated with each significant aspect. The Garrison shall have an EMP for every significant environmental aspect for which it has developed objectives and targets.
- **2.4. Performance indicators:** Provide information how well objectives and targets are managed at the installation.
- **2.5. Significant aspects:** An environmental aspect that potentially has a significant environmental or mission impact. Objectives and targets must be developed for every significant aspect identified at the Garrison

# 3. Roles and responsibilities

#### 3.1. Garrison Commander

Provides resources (financial, technical, personnel) to achieve objectives and targets set in the EMPs.

#### 3.2. Affected Division Chiefs

- 3.2.1. Review EMPs and recommend changes that are required to achieve objectives and targets or to allocate resources
- 3.2.2. Review progress in achievement of objectives and targets of EMPs during EMS Management Reviews or other EMS meetings (e.g. EQCC-Meetings)
  - 3.2.3. Identify legal and other requirements

#### 3.3. Environmental Management System Management Representative (EMSMR)

- 3.3.1. Coordinates the appointment of EMP-Managers
- 3.3.2. Communicates updates of EMPs to the EQCC on a regular base
- 3.3.3. Approves the EMPs

#### 3.4. Environmental Division

- 3.4.1. Assists with the preparation of the EMPs but does not develop EMPs alone
- 3.4.2. Drafts objectives and targets based on the significant aspects
- 3.4.3. Maintains copies of EMPs

#### 3.5. CFT

- 3.5.1. Provides suggestions on objectives and targets
- 3.5.2. Support the identification of legal and other requirements
- 3.5.3. Provides information required for the development of the EMPs
- 3.5.4. Communicates EMPs to all personnel who may contribute to the identified significant aspects and EMPs

# 3.6. EMP-Managers

- 3.6.1. Coordinating the development and maintaining the EMPs
- 3.6.2. Communicate every EMP to the EMSMR for review.
- 3.6.3. Provide an update of EMPs and progress made in every CFT meeting
- 3.6.4. Review EMPs when regulatory or program requirements or other factors change
  - 3.6.5. Request or coordinate funding of EMP actions as necessary

#### 3.7. EMP-Team members

- 3.7.1. Support the relevant EMP-Manager during preparation and implementation of EMPs
  - 3.7.2. Members can include, but are not limited to:
    - 3.7.2.1. CFT-members
    - 3.7.2.2. USAG Baumholder employees working in the affected field of work
    - 3.7.2.3. Commanders / Supervisors
  - 3.7.3. Team members shall possess:
    - 3.7.3.1. Relevant skills and qualification
    - 3.7.3.2. Training according to their duty
    - 3.7.3.3. Understanding of the EMP
    - 3.7.3.4. Experience in their particular work area

# 4. Procedure

#### 4.1. Objectives

The ED makes suggestions on objectives at a CFT meeting. The CFT as a mixture of experts from all different work areas of the garrison will discuss these suggestions for:

- 4.1.1. Logic
- 4.1.2. Funding
- 4.1.3. Practicability
- 4.1.4. Legal and other requirements
- 4.1.5. Mission requirements

## 4.1.6. Pollution prevention goals

## 4.2. Targets

Once the objectives are set the ED will define targets for each objective with the support of the CFT. The procedure for defining targets is the same as for the definition of objectives described in chapter 4.1.

#### 4.3. Performance indicators

When the objectives and targets are chosen the CFT has to discuss how the progress and improvement of a significant aspect will be measured. Therefore performance indicators shall be introduced. Performance indicators include, but are not limited to:

- 4.3.1. Significant aspect specific reports
- 4.3.2. Performance studies
- 4.3.3. Observation of the situation on site
- 4.3.4. Regularly inspections

With the help of performance indicators the CFT will determine the effectiveness of objective and targets and will make corrections if necessary.

# **4.4.** Environmental management program (EMP)

For every significant aspect an EMP shall be prepared. The EMP shows at minimum following information:

- 4.4.1. Objective
- 4.4.2. Targets
- 4.4.3. Performance indicators
- 4.4.4. Reason for significance
- 4.4.5. Environmental impacts
- 4.4.6. Legal and other requirements
- 4.4.7. Program description
- 4.4.8. Operational controls
- 4.4.9. Budget
- 4.4.10. Structure, authorities, responsibilities
- 4.4.11. POCs
- 4.4.12. Records
- 4.4.13. Documents

The ED takes care on the development and maintenance of EMPs. The EMPs themselves are developed in a coproduction of the CFT, ED, working groups, and other sources affected by the significant aspects. A template for an EMP is attached to this procedure.

Figure 1 Template of an EMP

ENIRONMENTAL MANAGEMENT PLAN						
Significant Environmental Aspect		<b>Document Control Code</b>				
Date Initiated	Anticipated	<b>Anticipated Completion Date</b>				
Person Responsible for Aspect	Unit		Phone			
Contributing Facilities, Activities, Produc	ts or Services					
Objective(s)	Tar	get(s)	Per	formance Indicator(s)		
Reason for Significance						
Potential Mission Degradation						
Legal and Other Requirements						
Plan Description (Steps, Methods, E	quipment, etc.)	1				
Operational Controls: Required? Yes □ No □ In Place? Yes □ No □						
Budget (resources) Required						
Structure, Authorities, Responsibilities						
Task(s)	Person Responsible					

Record(s)	Person Responsible and Record Location
Document(s)	Person Responsible and Record Location
Other Program Elements / Notes	

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# Appendix 4

**Environmental Management System (ISO 14001:2004 chapter 4.4.2)** 

# **BMH EP 4.4.2 Procedure for Environmental Awareness Training**

**Summary:** This procedure provides guidance for environmental awareness training

**Applicability:** To all units, organizations and directorates working on and on behalf of the USAG Baumholder

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

Forms: Sign in sheet

**Suggested improvements:** Send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the proponents listed above

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o adds a summary of change
- o adds new roles and responsibilities
- o introduces the environmental homepage as a training tool

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This document describes the environmental awareness training at USAG Baumholder. It applies to all persons working for USAG Baumholder, or on its behalf, to include military personnel, civilians, contractors, and tenant organizations.

#### 2. Definitions

**Environmental Awareness Training** provides a minimum of environmental information. Persons living and working at USAG Baumholder shall receive awareness training covering the following topics:

- 1. The EMS and its procedures
- 2. EMS policy
- 3. Other environmental programs
- 4. Significant aspects
- 5. Objectives and targets
- 6. Potential consequences

#### 3. Responsibilities

# 3.1. Supervisors

- 3.1.1. Have the oversight about training requirements and training needs for his/her employees
- 3.1.2. Have environmental training organized
- 3.1.3. Document environmental awareness training (e.g. sign-in sheet)

#### 3.2. Environmental Division

- 3.2.1. Prepares training material
- 3.2.2. Makes training material available on the homepage
- 3.2.3. Supports environmental awareness training if requested
- 3.2.4. Conducts environmental awareness training as part of the new comers briefing

## 3.3. Contract Inspection

- 3.3.1. Make contractors aware of this training requirement
- 3.3.2. Keep record of contractors who received the EMS flyer
- 3.3.3. Assist in implementing the procedure for integrating contractors into the EMS

#### 3.4. Contractors

- 3.4.1. Contract employees have to be informed about EMS
- 3.4.2. Perform the job according to EMS requirements
- 3.4.3. Receive and acknowledge receipt of EMS flyer

#### 4. Procedure

Environmental awareness training shall be provided annually and as part of new employee orientation. With the following mechanisms the EMS is communicated:

- 1. EMS awareness flyers are distributed during in-processing and in welcome packages for new housing residents
- 2. Environmental homepage. This homepage can be accessed through the official USAG Baumholder homepage
- 3. Earth day posters at schools, child development centers, and other places in the community
- 4. Educational campaigns at the Garrison held during meetings, assemblies, or designated training events

# 5. Training focus

- 5.1. General knowledge of the EMS
- 5.2. Locations of where the Garrison Environmental Policy can be found
- 5.3. Informing personnel about points of contact concerning environmental questions
- 5.4. The importance of management programs
- 5.5. The installations environmental objectives that everyone on the installation effects

#### 6. Records

Records include, but are not limited to, sign-in sheets of training participants. Refer to BMH EP 4.5.4 (Control of records) for further information about records management.

**Environmental Management System (ISO 14001:2004 chapter 4.4.2)** 

# **BMH EP 4.4.2 Procedure for Competence Training**

Summary: This procedure provides guidance for awareness training

**Applicability:** To all units, organizations, directorates, and contract companies working on and on behalf of the USAG Baumholder

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** No forms required by this procedure

**Suggested improvements:** send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the proponents listed above

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o adds a summary of change

2

This procedure provides a standard how training requirements for personnel performing tasks that may have the potential to cause a significant aspect are identified and tracked.

#### 2. Definitions

# Competency training provides insight into:

- 1. Safe working techniques
- 2. SOPs
- 3. Reaction in emergency situations
- 4. Consequences
- 5. Environmental issues
- 6. Handling of monitoring and measurement equipment

## 3. Responsibilities

# 3.1. Commanders/ directors/ supervisors

- 3.1.1. Identify and track training requirement for soldiers/ personnel
- 3.1.2. Train soldiers/ personnel if training is missing or outdated
- 3.1.3. Ensure funding for training
- 3.1.4. Ensure soldiers/ personnel attend the training
- 3.1.5. Track training certificates
- 3.1.6. Forward EO-training to the ED

#### 3.2. Environmental Division

- 3.2.1. Provides links to the IMCOM/E online Environmental Officer trainings
- 3.2.2. Inspects training records for EO training
- 3.2.3. Assists commanders directors and supervisors in identifying personnel that require competency training

## 3.3. Soldiers/ employees

- 3.3.1. Attend training courses
- 3.3.2. Are aware of received training
- 3.3.3. Maintain a copy of their own training certificates

## 3.4. Contract companies

- 3.4.1. Must have their personnel working on behalf of USAG Baumholder trained
- 3.4.2. Must provide proof of competency to the responsible contact person at the Garrison prior work starts

#### 4. Procedure

Unit commanders/ directors/ division chiefs must identify training requirements including, but not limited, to:

- 1. Tasks performed
- 2. Job descriptions
- 3. Detected deficiencies (e.g. after an inspection)
- 4. After accidents or emergencies

## 4.1. Content of training

The content of the training shall incorporate content contained in the EMPs for the designated significant aspects. The training should include the following topics in regards to the significant aspect:

- 4.1.1. Objective
- 4.1.2. Targets
- 4.1.3. Performance indicators
- 4.1.4. Reason for significance
- 4.1.5. Environmental impacts
- 4.1.6. Legal and other requirements
- 4.1.7. Program description
- 4.1.8. Operational controls
- 4.1.9. Budget
- 4.1.10. Structure, authorities, responsibilities
- 4.1.11. POCs
- 4.1.12. Records
- 4.1.13. Documents

## 4.2. Delivery of training

Training does not have to occur in the form of a formal classroom training session. Training can be delivered in any of the following methods:

- 4.2.1 General information documents, such as brochures, catalogues or reports
- 4.2.2 Operation manuals, process flowcharts, or quality and product plans
- 4.2.3 Reports from previous audits, assessments or reviews
- 4.2.4 Information from other areas such as facility management or occupational health and safety
  - 4.2.5 Lists of toxic substances or technical data reports such as MSDSs
- 4.2.6 Applicable legal requirements and other requirements which apply to the significant aspect

4.2.7 Other applicable information that provides information that can be used to inform the trainee on how potential risk regarding a significant aspect can be reduced

## 5. Records

Records created as a result of this procedure will be maintained electronically if feasible. Records include, but are not limited to:

- 1. Content of a training
- 2. Training records including date, attendance, instructor
- 3. Training certificates

Refer to BMH EP 4.5.4 (Control of records) for further information about records management.

**Environmental Management System (ISO 14001:2004 chapter 4.4.3)** 

# **BMH EP 4.4.3 Procedure for Communication**

**Summary:** This procedure provides guidance about effective communication of EMS and environmentally-related information

**Applicability:** This procedure applies to the Environmental Division

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** No forms required by this procedure

**Suggested improvements**: send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the proponents listed above

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o adds a summary of change

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This procedure describes the ways of environmental relevant communication at USAG Baumholder. It includes internal and external communications, the different communication medias, and the documents that are communicated.

#### 2. Definitions

- **2.1 External communication**: Any exchange of information with interested parties not part of USAG Baumholder or its chain of command.
- **2.2 Internal communication**: All exchange of information, to include verbal communication, e-mail, intranet, posters, memoranda, newsletters with installation personnel and organizations, to include organizations and personnel within the installation's chain of command.

# 3. Responsibilities

#### 3.1. Environmental Division

Provides and updates environmental training material. The material is provided through the environmental homepage.

#### 3.2. Public Affairs Office

Contacts the ED when it is aware of internal or external communications that require information regarding the Garrisons EMS.

#### 4. Communication

There are two different streams of communication

#### 4.1. Internal communication

Internal communication is a routine part of the normal operations and missions at the USAG Baumholder and its tenant activities. Major topics of internal communication include, but are not limited to:

- 1. EMS policy
- 2. Environmental inspection lists
- 3. Management plans (e.g. Spill Preventions and Response Plan)
- 4. EMS manual
- 5. Alarm plan
- 6. General environmental information

The proponent for environmental information is the Environmental Division. Internal communication methods may include:

- 1. Environmental Homepage
- 2. Meeting minutes
- 3. Posters
- 4. E-mail
- 5. Meetings (e.g. CFT, EQCC, EO-meeting, DPW Staff Call)

# 6. Training material

Environmental staff is encouraged to go out and talk directly to Soldiers, family members, and tenants to increase ecological and environmental awareness.

## 4.2. External communication

The PAO is responsible for coordinating responses for environmental information to or from external interested parties.

The ED has no influence on the procedures how this information is tracked or organized. For further information on procedures governing external communication contact the PAO.

#### 5. Records

Records created as a result of this procedure include, but are not limited to:

- 1. Meeting minutes
- 2. Emails
- 3. Letters

**Environmental Management System (ISO 14001:2004 chapter 4.4.5)** 

# BMH EP 4.4.5 Procedure for the Control of Environmentally Relevant Documents

**Summary:** This procedure provides guidance for the creation, processing, maintenance, and communicating (publishing) of documents under the umbrella of the Environmental Management System (EMS)

**Applicability:** To all personnel working on behalf of the USAG Baumholder Environmental Division, when creating documents for internal or external use

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division, Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes or revisions shall comply with this procedure

**Forms:** Form BHM-FRM-454, Document Index (locally generated)

**Suggested improvements:** Send comments and suggested improvements on DA Form 2028 to the proponents listed above

The revision dated March 2012:

- Changes the entire document and requires the reader to become familiar with the entire document.
- Establishes this document as part of a Baumholder Garrison Environmental Management System (EMS) Manual, thereby not requiring a separate signature
- o Separates document control and records management
- o Revokes the use of a document control database and implements the use of an index in spreadsheet format

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This procedure defines document control measures to ensure that current versions of all relevant environmental management system (EMS) documents are in use where needed.

# 2. Scope

This procedure applies to all controlled documents in use for the EMS at USAG Baumholder Environmental Division.

#### 3. Definition

- **3.1. Controlled Document:** The most recent authorized version of any electronic or hardcopy document in use to support the EMS that may be changed either internally or externally
- **3.2. Document:** Any electronic or hardcopy instructions, forms or reference information related to the EMS
  - **3.3. Document Index:** A list of documents required under EMS
  - **3.4. Obsolete Document:** A document that is no longer in use

# 4. Roles and responsibilities

## **4.1.** EMS Management Representative (EMSMR)

- 4.1.1. Responsible for the control of the EMS procedures and assures that supporting documents and any references thereto are routinely reviewed and maintained as appropriate
- 4.1.2. Approves EMS procedures and/or revisions in accordance with the purpose of this procedure
- 4.1.3. Ensures that the document control process described in this procedure is implemented as needed

#### **4.2.** EMS Coordinator

- 4.2.1. Responsible for maintaining the EMS document index and distribution of new and revised documents
  - 4.2.2. Responsible for removing obsolete documents from use

## **4.3.** Cross Functional Team (CFT)

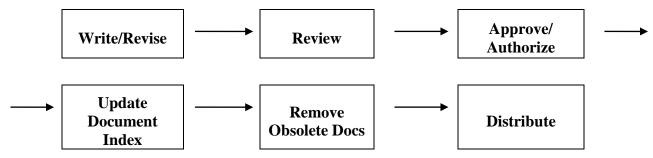
Assist in distribution, and implementation of current, revised, or new EMS documents

# 4.4. Subject Matter Experts (SME)

SMEs shall assist in the development and revision of EMS documents as applicable

#### 5. Procedure

The process steps for EMS document control are as follows:



#### 5.1. Write/Revise

- 5.1.1. The need of new EMS documents or modifications to existing EMS documents can result from system changes or improvements, product or process changes, periodic reviews or corrective and preventative actions. The need for a new or revised document can be initiated by any involved person at Baumholder and communicated to the EMSMR
- 5.1.2. The EMSMR or designee will evaluate appropriateness to the EMS and consider comments and input from the subject matter expert (SME), affected individuals, or activities, if necessary
- 5.1.3. If the need is determined to be appropriate, the EMSMR or designee will draft the document for review

#### 5.2. Review

- 5.2.1. Drafts of new EMS documents or EMS documents having substantive revisions should be circulated to personnel affected by the proposed changes when necessary
- 5.2.2. Affected personnel should review the new or revised document for comment to ensure that it reflects actual practice(s)
- 5.2.3. The EMSMR will routinely review EMS procedures for appropriateness to the EMS

## 5.3. Approve/Authorize

- 5.3.1. The EMSMR will review the final draft procedure for distribution
- 5.3.2. The EMS Coordinator will update the Summary of Change in the document and ensure the date is revised prior to release
- 5.3.3. The approved controlled copy of the EMS document will be maintained on the EMS website
- 5.3.4. The EMS Coordinator will update the document index with the newest date of publication

## **5.4.** Update Document Index

The EMS coordinator will maintain and keep current the document index as relevant updates to EMS documentation occur.

#### **5.5.** Remove Obsolete Documents

Obsolete documents, shall be removed from all drives, web sites, binders, or folders where current versions are maintained in order to avoid confusion in respect to potentially accessing the

wrong versions. Older version(s), if wished to be retained for technical reference of some kind, shall be managed in accordance with the records management procedure BHR-EP-454

#### 5.6. Distribute

- 5.6.1. All revised EMS documents will be posted to the website, which is the primary method of distribution for all EMS-related information
- 5.6.2. Information about revised EMS documents will also be distributed through the Cross Functional Team
- 5.6.3. The EMSMR or designee will notify all CFT members of new or revised EMS documents for implementation at regular team meetings. Additional notifications may be made through the CFT email distribution list as determined to be appropriate by the EMSMR or designee. Information presented will include the new or revised document by reference number (if applicable); title; revision date; necessary steps for implementation (if any); and reference to the new version on the USAG Baumholder website

(http://www.baumholder.army.mil/sites/directorates/Environmental/Homepage/index.htm)

## 6. Forms and records

BMH-FRM-454, Document Index

#### 7. References

Procedure BHR-EP-454, Records Management

**Environmental Management System (ISO 14001:2004 chapter 4.4.6)** 

BMH EP 4.4.6 Procedure for operational controls

**Summary:** This procedure provides guidance how to identify and manage operational controls for significant aspects identified at USAG Baumholder

Applicability: This procedure is applicable to USAG Baumholder Environmental Division

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** No forms required by this procedure

**Suggested improvements:** Send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the proponents listed above

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o adds a summary of change
- o adds new roles and responsibilities

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- 1.1. Identification of environmental operational controls required for operations associated with identified significant aspects.
- 1.2. Ensuring such controls are adequate to minimize the potential environmental impact from activities, adhere to USAG Baumholder's environmental policy, and meet all environmental objectives and targets.
- 1.3. Identification of management controls in place to compliment the operational controls, and periodical review of operational controls for relevance to mission activities being performed on the installation.

#### 2. Definitions

**Operational controls (OC):** Strategies how to manage, control, and improve a significant aspect. Operational controls are in most cases Standard Operating Procedures (SOPs).

## 3. Responsibilities

#### 3.1. Division Chiefs and Supervisors

- 3.1.1. Annually review, approve and if modified, sign operational controls (SOPs, operating instructions)
- 3.1.2. Maintain a copy of the signed documents Coordinate and organize job-specific training (EMS Competence Level Training) to relevant personnel based on the operating instruction and maintain records
- 3.1.3. Ensure that the operational controls are implemented by personnel in their areas of responsibilities

## 3.2. Environmental Division

- 3.2.1. Identifies and reviews significant aspects
- 3.2.2. Identifies and reviews operational controls
- 3.2.3. Writes SOPs for significant aspects that fall under ED
- 3.2.4. Distribution of SOPs and checking for effectiveness

#### 3.3. CFT

- 3.3.1. Supports the identification of operational controls
- 3.3.2. CFT-members review operational controls that affect their area of responsibility

## 3.4. EMS Management Representative

- 3.4.1. Ensure operating instructions (policies, Standard Operating Procedures, etc.) associated with identified significant aspects are prepared and kept
  - 3.4.2. Support enforcement of operating instructions, SOPs and policies

#### 4. Procedure

- 4.1. Each significant environmental aspect shall be reviewed in conjunction with its activities, products, or services and their associated environmental impact to determine whether OCs are needed.
- 4.2. Operational control procedures will be developed, reviewed and approved by the respective functional area director/supervisor
- 4.3. The Environmental Division will review and ensure that the operational controls address the specific environmental impact(s) that caused the significant aspect for the process.
- 4.4. Installation personnel whose work is covered by the operational controls will be trained on these procedures in accordance with USAG Baumholder's Competence Training Procedure to ensure that they are made aware of the consequences of deviating from the procedures.
- 4.5. Operational Control procedures will be reviewed annually by the proponents and ED to assure that they reflect current objectives, targets, expectations, and regulatory requirements. The procedures shall, be reviewed and revised more frequently if required as a result of nonconformance, corrective and/or preventive actions, audits, change in process, or as a result of the implementation of an Environmental Management Program.
- 4.6. OCs will also be applied to the identifiable significant environmental aspects of goods and services that are received from external sources and used at USAG Baumholder if deemed necessary.
- 4.7. Functional area managers/supervisors and the ED are responsible for ensuring that OCs are implemented for those activities, products or services that are within their purview and that contribute to an identified significant environmental aspects.
- 4.8. Changes in procedures or instructions shall be communicated to affected installation personnel and other parties as appropriate. This communication shall be in accordance with the installation internal and/external communication procedure.
- 4.9. Any communication shall be documented and maintained in accordance to the installation's records management procedure
- 4.10. Operational controls are summarized in the Environmental Management Programs (EMPs).

#### 5. Records

Records generated by this procedure include:

- 5.1. EMPs
- 5.2. Communication records

**Environmental Management System (ISO 14001:2004 chapter 4.4.7)** 

BMH EP 4.4.7 Emergency preparedness and response

**Summary:** This procedure describes procedures for emergency preparedness and response.

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** There are no forms required by this procedure

**Suggested improvements:** Send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the proponents listed above

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines proponent, review, forms and suggested improvements
- o inserts a table of contents
- o defines new roles and responsibilities

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		Safety	
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т.		Identify Environmental Emergency Response Plans and Procedures	
		Review and Update Emergency Response Plans and Procedures	
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_		Emergency Response	
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- 1.1. The purpose of this procedure is to describe the process to identify potential emergency situation and potential accidents and how USAG Baumholder will respond to them, and prevent or mitigate associated adverse environmental impacts.
- 1.2. The procedure does not address other consequences that may result from an incident or emergency.
- 1.3. An incident or emergency involves more than a mere non-conformance in the EMS or a minor spill release.

#### 2. Definitions

Under this procedure an emergency is an accident or an unlikely event which may have the potential to threaten the environment and its natural resources (e.g. water, plants, air, etc.).

# 3. Roles and Responsibilities

#### 3.1. Environmental Division

- 3.1.1. Prepares and communicates all plans identified in 4.1 below
- 3.1.2. Prepares and communicates environmental emergency response plans and procedures
- 3.1.3. Conducts regular inspections to prevent potential environmentally related incidents
- 3.1.4. Reviews environmental emergency response plans and procedures as demanded in the plans and procedures
  - 3.1.5. Maintains records of environmental accidents and emergencies
- 3.1.6. When responding to or assisting during a spill response, maintains records of the spill report

#### 3.2. Directorate of Emergency Services

- 3.2.1. Responsible to responding to emergency events
- 3.2.2. Conducts annual training and maintains records
- 3.2.3. Coordinates with the ED to handle environmental results of emergencies after health and human safety is secured
- 3.2.4. Maintains a Mutual Aid Agreement with local host nation fire department around Baumholder to ensure immediate response for emergencies

#### 3.3. Safety

- 3.3.1. Checked all their recourses and nothing is mentioned for "after the fact spills" that USAG Baumholder Safety will be involved in
- 3.3.2. Is proactive and not reactive and does not get involved with anything that has already occurred except some reporting to Higher HQ on the subject
  - 3.3.3. Is prepared to instruct in environmental emergencies if needed

#### 4. Procedure

## 4.1. Identify Environmental Emergency Response Plans and Procedures

Emergency response plans, procedures and other documentation related to environmental spills and releases include, but are not limited to:

- 4.1.1. Spill Prevention and Control Plan
- 4.1.2. Storm Water Pollution Prevention Plan
- 4.1.3. Hazardous Waste Management Plan
- 4.1.4. Drinking Water Master Plan
- 4.1.5. Water Flushing Plan
- 4.1.6. Asbestos Management Plan

# 4.2. Review and Update Emergency Response Plans and Procedures

Reviews ensure that plans and procedures meet all current regulatory requirements and identify changes on the installation that may affect plan execution. Reviews include plan attachments such as telephone numbers, POCs, maps, or floor plans.

## 4.3. Emergency Preparedness

Emergency preparedness will be exercised and tested through drills and tests in accordance with the respective plans. Plans and procedures are available to potentially affected personnel.

Training events to ensure preparedness for emergencies shall be regularly planned and scheduled by the Garrison DES. Records of these training events must be maintained internally by the DES.

## 4.4. Emergency Response

Responses to all accidents and emergencies will be conducted in accordance with procedures specified in response plans.

#### 5. Records

This procedure generates following records:

- 1. Records of incidents and emergencies that can result in environmental consequences
- 2. Records of reviews

**Environmental Management System (ISO 14001:2004 chapter 4.5.1)** 

# BMH EP 4.5.1 Monitoring and Measurement

**Summary:** This procedure describes the requirements how environmental performance shall be monitored and measured.

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

Forms: There are no forms required by this procedure

**Suggested improvements:** Send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the proponents listed above

- o changes the entire document
- o adds a new cover page
- o adds a new second page
- o defines proponent, review, forms and suggested improvements
- o inserts a table of contents
- o defines new roles and responsibilities

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The purpose of this procedure is to provide an overview about the monitoring and measurement of environmental progress especially with significant aspects.

#### 2. Definitions

- **2.1.** Environmental Management Plan (EMP): EMPs summarize the information needed to improve significant aspects.
- **2.2. Environmental Performance**: The management of environmental aspects, and the quantifiable results of that management
- **2.3. Environmental Performance Indicator**: A specific datum selected, such as the volume of a chemical used, which will provide measurable information regarding progress toward meeting a specific environmental objective and target. Performance indicators are set in every EMP.
- **2.4. Instruments with calibration**: These instruments need to be calibrated before use or before every measurement.
- **2.5. Instruments without calibration**: These instruments don't need a calibration before use. It is enough to get software updates as required by the instrument manuals.

# 3. Roles and Responsibilities

# 3.1. Cross Funtional Team (CFT)

If monitoring and measurement data does not meet the objectives and targets the CFT will discuss how to proceed and change the EMPs if needed.

#### 3.2. Supervisors

- 3.2.1. Have the oversight over their area of responsibility
- 3.2.2. Have knowledge of equipment used in their area of responsibility
- 3.2.3. Have equipment tested on the requirements provided by the manufacturer
- 3.2.4. Track calibration records
- 3.2.5. Ensure personnel are competent with handling instruments
- 3.2.6. Enshure self-inspections are performed

## 3.3. Environmental Management System Management Representative (EMSMR)

The EMSMR will ensure the monitoring and measurement data is incorporated into any reports that are reported to the EQCC.

## 3.4. Environmental Management Program (EMP) Leads

- 3.4.1. Present progress of significant aspects to the CFT
- 3.4.2. Ensure correct measurement of data
- 3.4.3. Ensure data required by the EMP is measured

## 3.5. Environmental Division (ED)

3.5.1. Conducts regular inspections to check progress

- 3.5.2. Conducts internal EPAS-inspections
- 3.5.3. Performs aspect/impact assessment
- 3.5.4. Provides checklists for self-inspections

# **3.6.** Environmental Officers (EOs)

- 3.6.1. Perform self-inspections
- 3.6.2. Keep the checklists on file

#### 4. Procedure

## 4.1. Aspect/ Impact assessment

The ED performs an aspect/ impact assessment on an annual base. The assessment will be performed in accordance with BMH EP 4.3.1.

#### 4.2. Inspections

## **4.2.1.** Self inspection

The environmental division developed unit/ activity/ shop specific checklists for self inspections. These self-inspections have to be performed by the unit/ activity/ shop EO at a point of time specified on the checklist. The completed checklists must be kept on file by the EO.

# **4.2.2.** Environmental inspections

The ED performs inspections at units/ activities/ shops on a regular base. Findings will be presented to supervisors for corrective action.

#### 4.3. Monitoring and measurement equipment

#### 4.3.1. Instruments with calibration

Instruments with calibration shall be calibrated before use or on a regular base. For calibration instructions personnel shall act according to manufacturer advice. The calibration records shall be maintained by the user of the equipment.

#### 4.3.2. Instruments without calibration

Instruments without calibration are directly calibrated at the manufacturer. When an instrument needs repair, it will be sent to the manufacturer or manufacturer approved repaired facility.

#### 5. Records

This procedure will generate the following records:

- 1. Checklists
- 2. Findings
- 3. Data records of ongoing or periodic measurement and monitoring
- 4. List of instruments used for monitoring and measurements
- 5. Calibration instructions
- 6. Actual calibrations (when and by whom)

These records shall be managed in accordance with BMH EP 4.5.4 or other records management systems

**Environmental Management System (ISO 14001:2004 chapter 4.5.2)** 

# BMH EP 4.5.2 Procedure for compliance audits

**Summary:** This procedure provides guidance how conduct compliance audits

**Applicability:** To all personnel working on behalf of the USAG Baumholder Environmental Division and external inspections in conjunction with external EPAS inspections

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** Internal / external inspection database

# **Summary of Change:**

The revision dated February 2012:

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o adds a chapter 6
- o defines responsibilities
- o provides definitions

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- 1.1. The purpose of this procedure is to provide a standard method for planning and conducting annual internal compliance audits and external compliance audits at the USAG Baumholder.
- 1.2. In an audit the main activities of the Garrison including units, host and tenant organizations, and contractors will be examined.
- 1.3. The internal assessment is conducted by installation personnel as part of their regular management, checking, and corrective action work, unless an external audit will be done in the same calendar year.

### 2. Definitions

- **2.1. Environmental Performance Assessment System (EPAS):** A review of facility operations, practices, and records to assess and verify compliance with federal, state and local laws and regulations
- **2.2. External EPAS:** An external EPAS is performed every three years by members from other Garrisons in Europe or the US
- **2.3. Internal EPAS:** An internal EPAS is performed annually by members of USAG Baumholder

## 3. Responsibilities

## 3.1. Lead auditor

- 3.1.1. Prepares an audit schedule (timetable) before the audit takes place
- 3.1.2. Forwards the audit schedule to the Chief Environmental Division at least two weeks in advance
  - 3.1.3. Conducts the in-briefing and the out-briefing
  - 3.1.4. Identify the tasks to be audited
  - 3.1.5. Prepares a short report about the audit

### 3.2. Internal auditor team

- 3.2.1. Has knowledge of the military system
- 3.2.2. Has knowledge of the topics to be inspected
- 3.2.3. Conducts the inspection by walk-through and interviews
- 3.2.4. Enters findings into the IMCOM-E database. It is important that every inspectors enters his/her findings by him-/herself
  - 3.2.5. Stays focused on the scope of the inspection

#### 3.3. Chief Environmental Division

Forwards the timetable to all affected units / activities as soon as possible

#### 3.4. Affected units / activities

Are prepared for the audit

## 3.5. Environmental officers

Are available at their division / activity when the audit takes place

# 4. Audit procedures and rules

#### 4.1. Timetable

A timetable must be prepared to plan the audit. This timetable must be sent to all units/ activities to be inspected at least two weeks in advance.

## 4.2. Planning

Before the audit begins an audit plan shall be set up. This plan is set up by the audit team leader and contains information about:

- 1. Audit scope and objectives
- 2. Audit criteria
- 3. Contact details of auditors and auditees
- 4. Audit dates and times
- 5. Contact details
- 6. Responsibilities

## 4.3. Required documents

Before the audit starts the audit team shall review relevant documents including:

- 1. Previous EPAS reports
- 2. Management plans and standard operating procedures

## 4.4. Audit process

- 4.4.1. Audits will be conducted primarily by walk-through and interviews with personnel
- 4.4.2. Auditors shall rely on personnel observations and when possible make photographs of the status and condition of the Garrison
- 4.4.3. The auditors shall focus on environmental issues. Safety issues are primarily addressed in safety inspections performed by safety or DES.
- 4.4.4. The audit team will conduct opening and closing meetings with the functional managers of the organizations and activities being audited
  - 4.4.5. The audit team will document findings in the IPAS database
- 4.4.6. The audit team will make suggestions about corrective actions. These corrective actions will be summarized in the final report

# 5. Reporting and final report

1.1. The software used for reporting of findings is the Army approved application database. Auditors enter their findings into the database by themselves.

1.2. During the closing meeting at the end of the audit the findings and corrective actions are presented in a final report prepared by the audit team leader.

## 6. Records

Records created as a result of this procedure will be maintained electronically and will be readily available upon the request of the CFT. Records include, but are not limited to:

- 1. Audit schedule
- 2. Final audit report
- 3. Internal audit checklist
- 4. IPAS database

Refer to BMH EP 4.5.4 (Control of records) for further information about records management.

**Environmental Management System (ISO 14001:2004 chapter 4.5.3)** 

# BMH EP 4.5.3 Procedure for addressing nonconformities

**Summary:** This procedure provides guidance how to track and document nonconformities in the installations EMS

**Applicability:** To all personnel working on behalf of the USAG Baumholder Environmental Division

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** Internal / external inspection database

# **Summary of Change:**

The revision dated February 2012:

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o adds a chapter 6
- o defines responsibilities
- o provides definitions

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This procedure provides the processes to track:

- 1.1. Nonconformance with the EMS
- 1.2. Nonconformance with legal and other requirements
- 1.3. Nonconformance with significant aspects
- 1.4. Nonconformance with environmental programs

### 2. Definitions

- **2.1. Nonconformity**: A situation or action that does not meet or comply with the requirements established in USAG Baumholder's EMS or the ISO 14001 standard
- **2.2.** Noncompliance: A situation where USAG Baumholder does not meet a legal or other requirement
- **2.3. Preventive action**: Preventive action is a process to prevent potential problems before they occur or become more severe
- **2.4.** Corrective action: A reactive process used to address problems after they have occurred
- **2.5. Finding**: Situation where nonconformity is detected. Findings include minor findings (e.g. change in a procedure) and major findings (e.g. systemic problems not easily corrected).
- **2.6. Short term finding**: Easy-fix-issues which can be handled without big budget of personnel involved. If closure of a finding involves budget or more than one person the finding becomes long term.
  - **2.7.** Long term finding: Findings which involve money and several persons.
- **2.8. Owner**: The person in whose area of responsibility a finding is located. Owners can be supervisors, workers, soldiers, or unit commanders.

## 3. Responsibilities

## 3.1. Public Affairs Office (PAO)

- 3.1.1. Is the first contact for host nation affairs
- 3.1.2. Gets in contact with the ED when there is an environmental complaint/suggestion from the host nation
- 3.1.3. Passes on information concerning issue. The information includes as a minimum the contact details and topic of the issue.

### 3.2. Environmental Division (ED)

- 3.2.1. Is the first POC regarding environmental issues
- 3.2.2. Communicate findings to persons responsible for the issue
- 3.2.3. Tracks of the elimination of findings

## 3.3. Owner of a finding

3.3.1. Is the person in whose area of responsibility a finding is located

- 3.3.2. Takes care of the elimination of the finding
- 3.3.3. Reports the status to the ED

## 3.4. Soldiers / employees / family members

- 3.4.1. Report findings to the ED
- 3.4.2. Are readily available during site visit of the ED

## 4. Findings

- 4.1. Findings found by Soldiers, family members, local national employees or other personnel working on behalf of the USAG Baumholder shall be directly reported to the ED as described in chapter 9 of this procedure.
- 4.2. Complaints or issues from external parties are investigated and responded by the USAG Baumholder Public Affairs Office (PAO).
- 4.3. This procedure also includes the response to environmental non-compliance findings, which are reported and tracked through existing Army or DPW systems. Findings include:
  - 4.3.1. tracked through the Environmental Performance Assessment System (EPAS),
  - 4.3.2. in the Installation Status Report (ISR),
  - 4.3.3. resulting from compliance inspections by host nation authorities,
- 4.3.4. from internal environmental compliance inspections (using the IMCOM-E Performance Assessment System software or IPAS software)

#### 5. Procedure

- 5.1. Potential or actual nonconformities can be identified from audits and reviews, findings, and recommendations reached as a result of measuring and monitoring, accidents or spills, observations or comments, and changes to USAG Baumholder's mission, activities or structure.
- 5.2. Typical causes for nonconformities include poor communication, faulty or missing procedures, equipment malfunctions, lack of training, lack of understanding of requirements and procedures, failure to enforce rules and procedures, and corrective actions that fail to address root causes of problems.

## 6. Findings reported by Soldiers / private persons

- 6.1. Any person indentifying nonconformity (e.g. oil spill, wild waste dumps, etc.) informs the Environmental Division by phone, email, or other. Contact details must be submitted.
- 6.2. For documentation reasons under the EMS the ED takes care that the finding is recorded. ED personnel shall make an appointment with the reporting person and get an impression of the situation personally.
- 6.3. The nonconformity is entered into the internal/external EPAS database. In the database it shall be noted that the finding was reported by someone not associated with the ED or audit.

### 7. Findings found during inspections

7.1. Findings identified during inspections, audits, etc are entered into the internal/external EPAS database by the inspectors.

7.2. Findings found during inspections are handled as described in chapter 9 of this procedure.

## 8. Findings reported by the PAO

- 8.1. When a finding is reported to the PAO this office forwards the contact details of the reporting person to the ED by E-mail.
  - 8.2. The ED will then proceed as described in chapter 9 of this procedure.

# 9. Finding elimination

Depending on the finding the elimination can be short term or long term.

## 9.1. Short term finding

The ED shall:

- 9.1.1. analyze the finding
- 9.1.2. find out to whom the finding belongs (owner)
- 9.1.3. get in contact with the owner
- 9.1.4. give the owner the responsibility of the finding
- 9.1.5. owner shall take care of the finding, eliminate it and report success to the ED

# 9.2. Long term findings

Long term findings often need a budget and involve several people.

The ED shall:

- 9.2.1. bring the finding to the CFT
- 9.2.2. discuss further approach with the CFT
- 9.2.3. pass the finding on to the CFT-member in whose area of responsibility the finding belongs (owner)
  - 9.2.4. owner shall take care of the finding (to include budgeting, staffing, reporting to higher level, etc.), eliminate it and report success to the ED

For long term findings it may be suitable to prepare Environmental Management Plans as described in BMH EP 4.4.3 (Objectives and Targets).

## 10. Records

Records created as a result of this procedure will be maintained electronically and will be readily available to the CFT. Records include, but are not limited to:

- 10.1. notification E-mails as described in this procedure
- 10.2. finding reports as described in this procedure
- 10.3. databases as described in this procedure

Refer to BMH EP 4.5.4 (Control of records) for further information about records management.

**Environmental Management System (ISO 14001:2004 chapter 4.5.4)** 

## BMH EP 4.5.4 Procedure for control of records

**Summary:** This procedure provides guidance how to identify and track at the ED

**Applicability:** To all personnel working on behalf of the USAG Baumholder Environmental division

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** Record master list (managed separately at the ED)

# **Summary of change:**

The revision dated March 2012:

- Changes the entire document and requires the reader to become familiar with the entire document.
- Establishes this document as part of a Baumholder Garrison Environmental Management System (EMS) Manual, thereby not requiring a separate signature
- o Separates records management from document control
- o Implements the use of a record index in spreadsheet format

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This procedure identifies the management of environmental compliance and Environmental Management System (EMS) records at Baumholder to ensure that they are maintained in an organized and readily retrievable manner and are disposed of according to established retention requirements.

## 2. Scope

This procedure applies to all records pertaining to the Fort Rucker EMS, including those required by applicable federal, state, and local regulatory requirements.

#### 3. Definitions

- **3.1. Legal requirements:** All laws, regulations, permits, contracts, memorandums of agreement or understanding, instructions, and orders applicable to Baumholder operations, activities and services
- **3.2. Other requirements:** Requirements not identified under legal requirements, and standard practices (DOD, DA, etc) to which Baumholder subscribes
- **3.3. Record:** Documented information that is evidence of an environmental activity or event in support of the EMS or any legal and other requirement retained by schedule for future reference. This can include, and by far is not limited to, procedures, instructions, legal and other requirements, completed forms, reports, technical instructions, and electronic mail (e-mail)
- **3.4. Record holder:** Those personnel responsible for retaining EMS records, as indicated on the Record Index. Generally the record holder is someone who works out of the office, shop, division, branch, or alike with the function, that creates the record
- **3.5. Retention time:** The length of time that a record shall be retained before it is no longer required and can be destroyed
- **3.6. Disposition:** The final settlement of a record. This may be destruction by shredding hard copies, deleting electronic files, or shipping/transferring to the Army Europe Records Holding Area (AERHA)

### 4. Roles and responsibilities

## 4.1. EMS Management Representative (EMSMR)

Responsible for identifying environmental compliance and EMS records that should be maintained according to this procedure.

## 4.2. EMS Coordinator

Maintains overall responsibility of the Record Index.

### 4.3. Record Holder

Maintains and retains applicable records as indicated on Record Index

#### 5. Procedure

## 5.1. Appearance

5.1.1. All records retained for conformance with the Baumholder EMS must be:

- 5.1.1.1. Legible, identifiable and traceable
- 5.1.1.2. Stored and maintained to be readily retrievable and protected against damage, deterioration, or loss
- 5.1.1.3. Kept in accordance with the legal or other requirements that establish their retention times and AER 25-400-2
- 5.1.2. The process steps for managing environmental compliance records and EMS records at Baumholder include the following:



### 5.2. Identification

The EMSMR, EMS Coordinator, and SME will identify the required EMS and environmental compliance records. The EMSMR will designate the responsible record holder to compile the identified records.

#### 5.3. Maintenance

The EMS Coordinator will annotate the responsible record holder in the Record Index. The index details the location/maintenance, responsible record holder and retention time of applicable records. Records may either be maintained electronically or hardcopy, as appropriate for the particular record.

### 5.4. Disposition

The individual record holders are responsible for the disposition of their responsible record. Disposition occurs once the minimum retention times have been achieved. **NOTE:** Records with a disposition indicator of **Transfer** or **Permanent**, which have been scanned, copied, or whatever electronic means were applied to obtain an electronic version, shall not be destroyed without approval from the Records Manager and AERHA.

#### 6. Records

BMH-FRM-454, Record Index

### 7. References

AER 25-400-2, Army in Europe Records Information Management System

**Environmental Management System (ISO 14001:2004 chapter 4.5.5)** 

### BMH EP 4.5.5 Procedure for Internal EMS audits

Summary: This procedure provides guidance how to plan and conduct internal EMS audit

**Applicability:** To all personnel working on behalf of the USAG Baumholder Environmental division

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** Internal / external inspection database

# **Summary of Change:**

The revision dated February 2012:

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o inserts a summary of change
- o defines new roles and responsibilities

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- 1.1. The purpose of this procedure is to provide a standard method for planning and conducting annual internal EMS audits at the USAG Baumholder.
- 1.2. These audits ensure a periodic review of the installations EMS and its conformance with intern procedures and legal and other requirements.
  - 1.3. In an audit the key elements of the EMS will be examined.
- 1.4. The assessment is conducted by installation personnel as part of their regular management, checking, and corrective action work, unless an external audit will be done in the same calendar year.

#### 2. Definitions

**Internal audit**: A review of facility operations, practices, and records to access and verify compliance with federal, state and local laws and regulations.

## 3. Responsibilities

## 3.1. Lead auditor

- 3.1.1. Prepares an audit schedule before the audit takes place and forwards it to the Chief Environmental Division at least two weeks in advance
  - 3.1.2. Is responsible for the in-briefing and the out-briefing
  - 3.1.3. Identifies the tasks to be audited
- 3.1.4. Prepares a short report about the audit including findings and corrective actions

#### 3.2. Internal auditor team

- 3.2.1. Has knowledge of records described in chapter 4.3
- 3.2.2. Enters the findings into the IPAS database
- 3.2.3. Is designated by the EMSMR
- 3.2.4. Are competent to conduct such an audit

#### 4. Audit Procedure

#### 4.1. Timetable

Not all elements of the EMS are required to be audited at one time. Internal audits may span the course of a year so long as all elements and organizations within the scope of the EMS are audited and reported on at least once a year.

### 4.2. Planning

Before the audit begins an audit plan shall be set up. This plan is set up by the audit team leader and contains information about:

- 1. Audit scope and objectives
- 2. Audit criteria
- 3. Contact details of auditors and auditees

- 4. Audit dates and times
- 5. Contact details
- 6. Responsibilities

## 4.3. Required documents

Before the audit starts the audit team shall get to know the documentation used in the installations EMS. This documentation consists of:

- 1. EMS documents and records like EMS manual, procedures, and checklists.
- 2. Previous EMS audit reports
- 3. Previous EPAS reports
- 4. Management plans

## 4.4. Audit process

- 4.4.1. EMS audits will be conducted primarily through interviews with personnel
- 4.4.2. EMS auditors may rely on records for information related to the functioning of the EMS and its objectives and targets
- 4.4.3. EMS auditors may rely on personnel observations to make a picture about the EMS status and conditions
  - 4.4.4. Auditor shall use the USAG Baumholder internal audit checklist
- 4.4.5. The audit team will conduct opening and closing meetings with the functional managers of the organizations and activities being audited
  - 4.4.6. The audit team will document findings in the IPAS database
- 4.4.7. The audit team will make suggestions about corrective actions. These corrective actions will be summarized in the final report

## 4.5. Reporting and final report

- 4.5.1. The software used for reporting of findings is the Army approved application database. The auditors enter their findings into the database.
- 4.5.2. During the closing meeting at the end of the audit the findings and corrective actions are presented in a final report prepared by the audit team leader.

## 5. Records

Records created as a result of this procedure will be maintained electronically and will be readily available to the CFT. Records include, but are not limited to:

- 1. Audit schedule
- 2. Final audit report
- 3. Internal audit checklist
- 4. IPAS database

Refer to BMH EP 4.5.4 (Control of records) for further information about records management.

**Environmental Management System (ISO 14001:2004 chapter 4.6)** 

# BMH EP 4.6 Procedure for management review

**Summary:** This procedure provides guidance how to perform management review of the Garrisons EMS.

Applicability: This procedure is applicable to USAG Baumholder Environmental Division

**Proponent:** The proponent of this procedure is the Directorate of Public Works, Environmental Division (IMBM-PWE), Unit #23746, Box #16, APO AE 09034, DSN 485-6621

**Review:** This document shall be reviewed on an annual basis. Changes and revisions shall comply with BMH EP 4.4.5 (Document Control)

**Forms:** No form required by this procedure

# **Summary of Change:**

The revision dated February 2012:

- o changes the entire document
- o adds a new cover page
- o adds a new Summary of Change page
- o defines applicability, proponent, review, forms and suggested improvements
- o inserts a table of contents
- o adds a summary of change
- o adds new roles and responsibilities

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This procedure is a suggestion for the periodic management reviews of the installation's Environmental Management System (EMS). This EMS procedure may ensure the periodic review of the EMS for its continued suitability, adequacy, and effectiveness. Additionally, periodic management reviews may address the need for modifications to policy, objectives and targets, and other elements of the EMS.

#### 2. Definitions

- **2.1. Top management:** Top management includes, at a minimum, the Garrison Commander and may include Senior Mission Commanders, directors, and division chiefs
- **2.2. Suitability:** Refers to whether the EMS continues to accord with the nature of the organization
  - **2.3.** Adequacy: Refers to the sufficiency of the resources for the EMS
- **2.4. Effectiveness**: Refers to the accomplishment of the objectives and targets set for the EMS

## 3. Responsibilities

# 3.1. Garrison Commander or his designee

- 3.1.1. Signs the EMS manual and the EMS policy
- 3.1.2. Receives a copy of the EMS review report
- 3.1.3. Provides comments on the report

### 3.2. Chief Environmental Division

Is responsible for coordinating and scheduling meetings with ED personnel to review the EMS.

### **3.3. EQCC**

- 3.3.1. Receives a report of the EMS review
- 3.3.2. Provides comments on the report

### 3.4. Environmental Division

- 3.4.1. Reviews the EMS annually
- 3.4.2. Provides a report to top management

# 4. Procedure

## 4.1. Minimum requirements

At a minimum, the following items will be discussed during the EMS management review:

- 4.1.1. Results from recently completed EMS audits
- 4.1.2. Communication from external interested parties to include complaints received
- 4.1.3. Status report on the progress of attaining objectives and targets
- 4.1.4. Status of regulatory compliance

- 4.1.5. Status of corrective and preventive actions to include information on violations received since the last EMS review
  - 4.1.6. Status of action items from previous EMS management reviews
- 4.1.7. Developments in legal and other regulatory requirements related to USAG Baumholder's environmental aspects
  - 4.1.8. Recommendations for improvement of the EMS

#### 4.2. Additional evaluations

In addition, the EMS management review will evaluate the need to change the environmental policy, objectives and targets, and other elements of the EMS due to the following:

- 4.2.1. Changes in mission
- 4.2.2. Addition of new facilities
- 4.2.3. Changes in expectations and requirements of interested parties
- 4.2.4. Changes in the products or activities of the installation
- 4.2.5. Advances in science or technology
- 4.2.6. Lessons learned from environmental incidents or emergency response
- 4.2.7. Changes in reporting and communication structures within the installation

## 5. Results of the Management Review

- 5.1. Identification of areas of opportunity for continual improvement of the EMS that lead to improved environmental performance
  - 5.2. Identification of the root cause(s) of non-conformance or deficiencies
- 5.3. Management approval for new corrective and preventative action plans or concurrence that existing plans continue to be adequate and effective
  - 5.4. Identification of procedural changes resulting from process improvement
- 5.5. Identification of needed changes to the environmental policy, objectives and targets or other elements of the EMS

#### 6. Records

Records generated by this procedure include:

- 6.1. Minutes or notes of the management review that cover the attendance, the information that was presented, the determinations made, and the decisions made
- 6.2. Records of follow-up actions initiated and completed to give effect to top management decisions taken during the review